

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

RACHEL COLANGELO and KATHLEEN PARADOWSKI, individually and on behalf of a class of similarly situated individuals,

Plaintiffs,

v.

CHAMPION PETFOODS USA, INC. and CHAMPION PETFOODS LP,

Defendants.

Case No: 6:18-CV-01228-LEK-DEP

STIPULATION REGARDING EXPERT DISCOVERY DEADLINE

WHEREAS, on June 3, 2020, the parties filed a Civil Case Management Plan [Docket 79] which proposed expert discovery shall be completed on or before March 31, 2021; and

WHEREAS, on June 10, 2020, the Court issued its Uniform Pretrial Scheduling Order [Docket 82] stating expert discovery shall be completed by March 31, 2021;

WHEREAS, The Parties have made initial attempts at mediation on August 26, 2020 in front of Judge Matz in the Northern District of New York but were unsuccessful;

WHEREAS, The Parties have subsequently scheduled another mediation in front of Judge Matz in the Northern District of New York for January 4, 2021.

IT IS HEREBY STIPULATED AND AGREED by all parties, through their undersigned counsel, the Court extend all expert disclosure to April 30, 2021.

Dated: December 28, 2020

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

By: s/ Rebecca A. Peterson
ROBERT K. SHELQUIST (*pro hac vice*)
REBECCA A. PETERSON (*pro hac vice*)
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Telephone: (612) 339-6900
Facsimile: (612) 339-0981
rkshelquist@locklaw.com
rapeterson@locklaw.com

CUNEO GILBERT & LADUCA, LLP
CHARLES J. LADUCA (N.Y. Bar No. 3975927)
KATHERINE VAN DYCK (*pro hac vice*)
BRENDAN S. THOMPSON (*pro hac vice*)
4725 Wisconsin Ave NW, Suite 200
Washington, DC 20016
Telephone: 202-789-3960
Facsimile: 202-789-1813
charles@cuneolaw.com
kvandyck@cuneolaw.com
brendan@cuneolaw.com

ROBBINS LLP
KEVIN A. SEELY
5040 Shoreham Place
San Diego, CA 92122
Telephone: (619) 525-3990
Facsimile: (619) 525-3991
E-mail: kseely@robbinsllp.com

GUSTAFSON GLUEK, PLLC
DANIEL E. GUSTAFSON (*pro hac vice*)
RAINIA C. BORRELLI (*pro hac vice*)
Canadian Pacific Plaza
120 South 6th Street, Suite 2600
Minneapolis, MN 55402
Telephone: (612) 333-8844
Facsimile: (612) 339-6622
dgustafson@gustafsongluek.com
rborrelli@gustafsongluek.com

LITE DEPALMA GREENBERG, LLC
JOSEPH J. DEPALMA (*pro hac vice*)
SUSANA CRUZ HODGE (*pro hac vice*)
570 Broad Street, Suite 1201
Newark, NJ 07102
Telephone: (973) 623-3000
jdepalma@litedepalma.com
scrughodge@litedepalma.com

ANDREWS DEVALARIO LLP
Darryl Andrews (*pro hac vice*)
265 Franklin Street, Suite 1702
Boston, MA 02110
Telephone: (617) 936-2796
daryl@andrewsdevalario.com

Attorneys for Plaintiff Kathleen Paradowski

Dated: December 28, 2020

GREENBERG TRAURIG, P.A.

By: s/ David A. Coulson
David A. Coulson
(admitted pro hac vice)
333 SE 2nd Avenue, Suite 4400
Miami, FL 33131
Tel: (305) 579-0754
Fax: (305) 579-0500
Email: coulson@gtlaw.com

Cynthia E. Neidl (513737)
GREENBERG TRAURIG, LLP
54 State Street, 6th Floor
Albany, New York 12207
Tel: (518) 689-1435
Fax: (518) 677-1828
Email: neidlc@gtlaw.com

Attorneys for Defendants Champion Petfoods USA, Inc. and Champion Petfoods LP